



BellSouth Telecommunications, Inc.

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November 27, 2000

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Generic Docket Addressing Rural Universal Service*
Docket No. 00-00523

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of the Rebuttal Testimony of John Ruscilli on behalf of BellSouth. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

Guy M. Hicks

GMH:ch
Enclosure

POSTED
11/29/00

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 REBUTTAL TESTIMONY OF JOHN A. RUSCILLI
3 BEFORE THE TENNESSEE REGULATORY AUTHORITY
4 DOCKET NO. 00-00523
5 NOVEMBER 27, 2000

6
7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR
9 BUSINESS ADDRESS.

10
11 A. My name is John A. Ruscilli. I am employed by BellSouth as Senior Director
12 for State Regulatory for the nine-state BellSouth region. My business address
13 is 675 West Peachtree Street, Atlanta, Georgia 30375.

14
15 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND
16 AND EXPERIENCE.

17
18 A. I attended the University of Alabama in Birmingham where I earned a Bachelor
19 of Science Degree in 1979 and a Master of Business Administration in 1982.
20 After graduation I began employment with South Central Bell as an Account
21 Executive in Marketing, transferring to AT&T in 1983. I joined BellSouth in
22 late 1984 as an analyst in Market Research, and in late 1985 moved into the
23 Pricing and Economics organization with various responsibilities for business
24 case analysis, tariffing, demand analysis and price regulation. I served as a
25 subject matter expert on ISDN tariffing in various commission and public

1 service commission ("PSC") staff meetings in Tennessee, Florida, North
2 Carolina and Georgia. I later moved into the State Regulatory and External
3 Affairs organization with responsibility for implementing both state price
4 regulation requirements and the provisions of the Telecommunications Act of
5 1996 ("the Act"), through arbitration and 271 hearing support. In July 1997, I
6 became Director of Regulatory and Legislative Affairs for BellSouth Long
7 Distance, Inc., with responsibilities that included obtaining the necessary
8 certificates of public convenience and necessity, testifying, Federal
9 Communications Commission ("FCC") and PSC support, federal and state
10 compliance reporting and tariffing for all 50 states and the FCC. I assumed my
11 current position in July 2000.

12
13 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

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15 A. The purpose of my testimony is to rebut, in part, the testimony of Steven E.
16 Watkins, dated November 13, 200, testifying on behalf of the Coalition of
17 LECs and Cooperatives ("Coalition"), formerly known as the Rural
18 Independent Coalition.

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21 Q. WHY DID BELL SOUTH ONLY RESPOND WITH REBUTTAL IN THIS
22 PROCEEDING?

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24 A. In the Pre-hearing Conference of October 31, 2000 of this docket, all parties
25 were given the opportunity to append, refine, or otherwise modify, the

1 Threshold Issues List, the Preliminary Issues List, and the Legal Issues List.

2 As reported by the Pre-Hearing Officer in the Report and Recommendation
3 dated November 8, 2000, parties were unanimous in their agreement to the
4 inclusion of all issues. Since all parties agreed to the Issues Lists, the purpose
5 of recently filed testimony in this docket should have been to address only the
6 issues listed. BellSouth did not file direct testimony in this proceeding because
7 we have not taken a position on the need for a rural universal service fund, or
8 any other preliminary or threshold issues. Mr. Watkins strays beyond the
9 proper issues of this proceeding to repeatedly advocate the Coalition's
10 proposed plan. The plan offered by the Coalition was previously described in
11 comments filed by the Coalition in this proceeding, and BellSouth has recorded
12 its opposition to the plan in reply comments filed on September 19, 2000. It is
13 not appropriate at this time for the Coalition to offer further testimony
14 regarding the merits of the plan, but rather testimony should be confined to the
15 agreed upon issues.
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19 Q. DO YOU OFFER ANY ADDITIONAL TESTIMONY CONCERNING THE
20 PRELIMINARY OR THRESHOLD ISSUES?

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22 A. No. As I stated above, the Coalition's plan has already been addressed in
23 comments. Based upon the TRA's ruling on the legal, preliminary, and
24 threshold issues, there may or may not be continued proceedings to establish a
25 rural universal service fund. If the TRA decides that there should be a fund

1 and this proceeding continues for this purpose, I presume that appropriate
2 issues will be formed to allow plans to be proposed and discussed in
3 subsequent testimony, including the Coalition's plan. BellSouth will respond
4 further to the Coalition's plan in testimony to be filed at the appropriate time.
5 In the meantime, I will decline to follow Mr. Watkins lead by debating the
6 merits of matters outside of the proper scope of this phase of the proceeding.

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9 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

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12 A. Yes.

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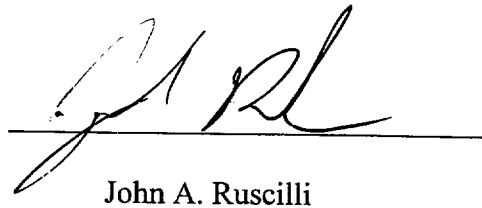
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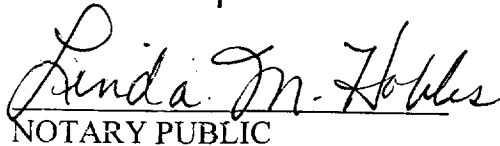
STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared John A. Ruscilli – Senior Director – State Regulatory, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 00-00523 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 4 pages and 0 exhibit(s).


John A. Ruscilli

Sworn to and subscribed
before me on 11/22/00


NOTARY PUBLIC

Notary Public, Gwinnett County, Georgia
My Commission Expires March 17, 2003

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

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Bethesda, MD 20817

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Charles B. Welch, Esquire
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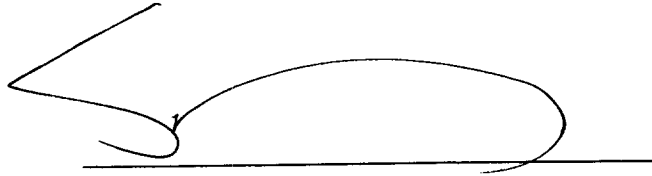
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James Lamoureux, Esquire
AT&T
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A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line that extends to the right.